

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

VS.

JASON ROSS,

Defendant.

CASE NO: 2:15-CR-302-JCM-CWH

**UNOPPOSED MOTION TO CONDUCT A  
PRE-PLEA PRESENTENCE  
INVESTIGATION REPORT AND  
PROPOSED ORDER**

COMES NOW, JASON ROSS, by and through his attorney of record, JAMES A. ORONCZ, ESQ., of the law firm ORONCZ & ERICSSON LLC, and hereby moves this Honorable Court to order the United States Department of Parole & Probation to conduct a pre-plea presentence investigation report of JASON ROSS as soon as possible.

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**III. CONCLUSION**

Based on the foregoing, Defendant asks this Court to grant his Motion to Conduct a Pre-Plea Presentence Investigation Report. Defendant further requests this Court order the United States Department of Parole & Probation to conduct a pre-plea presentence investigation report of Mr. Ross as soon as possible.

Dated this 19<sup>th</sup> day of February, 2016.

/s/ James A. Oronoz  
JAMES A. ORONoz, ESQ.  
Nevada Bar No. 6769  
700 South Third Street  
Las Vegas, NV 89101  
*Attorney for Jason Ross*



**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that I am an employee of Oronoz & Ericsson LLC and is a person of such age and discretion as to be competent to serve papers.

That on February 19, 2016, I served an electronic copy of the above and foregoing MOTION TO CONDUCT A PRE-PLEA PRESENTENCE INVESTIGATION REPORT AND PROPOSED ORDER by electronic service (ECF) to the person(s) named below:

DANIEL G. BOGDEN  
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*Counsel for United States*

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/s/ Lucas Gaffney, Esq.  
Employee of the Oronoz & Ericsson LLC